

REMARKS

***Summary of the Amendment***

Upon entry of the above amendment, claims 1-5, 8, 16, 28, 30, 31, and 48-50 will have been amended. Accordingly, claims 1-35, 38, 40-44 and 48-50 will be pending, with claims 1 and 48-50 being independent.

***Summary of the Official Action***

In the instant Office Action, the Examiner rejected claims 1-35, 38, 40-44 and 48-50 over the art of record. By the present amendment and remarks, Applicant submits that the rejections have been overcome, and respectfully request reconsideration of the outstanding Office Action and allowance of the present application.

***Present Amendment is proper for entry***

Applicant submits that the instant amendment is proper for entry after final rejection. In particular, Applicant notes that no question of new matter nor are any new issues raised in entering the instant amendment of the claims and that no new search would be required.

Moreover, Applicant submits that the instant amendment places the application in condition for allowance, or at least in better form for appeal.

Accordingly, Applicant request that the Examiner enter the instant amendment,

P20906.A07

consider the merits of the same, and indicate the allowability of the present application and each of the pending claims.

***Traversal of Rejection Under 35 U.S.C. § 102/103***

Applicant traverses the rejection of claims 1, 15-19, 22-24, 27, 28, 38, 40 and 48-50 under 35 U.S.C. § 102(b) as being anticipated by WO 98/27279 or in the alternative, under 35 U.S.C. § 103(a) as obvious over WO 98/27279 in view of US patent 4,366,025 to GORDON, Jr. et al.

The Examiner asserted that WO '279 discloses or suggests, in combination with GORDON, all the features recited in these claims. Applicant respectfully traverses this rejection.

Applicant submits that the rejection is improper because WO '279 with or without GORDON, does not disclose or even suggest, all the recited features of the above-noted claims, and in particular, at least independent claims 1 and 48-50, as amended herein.

Notwithstanding the Office Action assertions as to what these documents disclose, Applicant submits that these documents fail to disclose or even suggest, inter alia, *an additional doctor being assigned to at least one felt that is guided around the rotating roll*, the additional doctor being arranged upstream and at a distance from a take-on point and a low pressure suction device located near the additional doctor, as recited in amended

P20906.A07

independent claim 1, inter alia, a cleaning device arranged within the housing, wherein the cleaning device can *impinge the roll surface with a medium under a pressure that is greater than approximately 20 bar and less than about 30 bar*, as recited in amended independent claim 48, inter alia, a cleaning device arranged within the housing, wherein the cleaning device comprises *a rotating spray head that can impinge the roll surface with a medium under a pressure that is greater than approximately 20 bar and less than about 30 bar*, as recited in amended independent claim 49, and inter alia, a cleaning device comprising *a spray head with nozzles that can impinge the roll surface with a medium under a pressure that is greater than approximately 20 bar and less than about 30 bar*, as recited in amended independent claim 50.

Applicant acknowledges that Figs. 1 and 2 of WO '279 apparently show a roll 5, two doctors 3 and 4, and a cleaning device 9. However, this document contains no apparent disclosure with regard to the roll 5 having grooves and/or blind bores. Nor is there any disclosure with regard to an additional doctor being assigned to at least one felt that is guided around the rotating roll, the additional doctor being arranged upstream and at a distance from a take-on point and a low pressure suction device located near the additional doctor. It is also apparent that this document lacks any disclosure with regard to a cleaning device arranged within the housing, wherein the cleaning device can impinge the roll surface with a medium under a pressure that is greater than approximately 20 bar and less than about 30 bar, or with

P20906.A07

regard to a cleaning device arranged within the housing, wherein the cleaning device comprises a rotating spray head that can impinge the roll surface with a medium under a pressure that is greater than approximately 20 bar and less than about 30 bar, or with regard to a cleaning device comprising a spray head with nozzles that can impinge the roll surface with a medium under a pressure that is greater than approximately 20 bar and less than about 30 bar.

Nor does Applicant dispute that Figs. 4 and 5 of GORDON show a roll 11 having blind bores. However, it is clear that this document also contains no disclosure with regard to an additional doctor being assigned to at least one felt that is guided around the rotating roll, the additional doctor being arranged upstream and at a distance from a take-on point and a low pressure suction device located near the additional doctor. It is also clear that this document lacks any disclosure with regard to a cleaning device arranged within the housing, wherein the cleaning device can impinge the roll surface with a medium under a pressure that is greater than approximately 20 bar and less than about 30 bar, or with regard to a cleaning device arranged within the housing, wherein the cleaning device comprises a rotating spray head that can impinge the roll surface with a medium under a pressure that is greater than approximately 20 bar and less than about 30 bar, or with regard to a cleaning device comprising a spray head with nozzles that can impinge the roll surface with a medium under a pressure that is greater than approximately 20 bar and less than about 30 bar.

Thus, Applicant submits that at least independent claims 1 and 48-50 are not disclosed or suggested by any proper reading of WO '279 or any proper combination of WO '279 and GORDON.

Applicant notes that, for an anticipation rejection under 35 U.S.C. § 102(b) to be proper, each element of the claim in question must be disclosed in a single document, and if the document relied upon does not do so, then the rejection must be withdrawn.

Moreover, because each of the applied documents fails to disclose or suggest at least the above-noted features of the instant invention, Applicant submits that any proper combination of these documents fails to render unpatentable the combination of features recited in at least independent claims 1 and 48-50.

Further, even assuming, *arguendo*, that it would have been obvious to modify WO '279 to include the missing features, (which Applicant submits it would not be), Applicant notes that the combination of the teachings of the applied documents would nevertheless fail to result in a device having the combination of features recited in at least claims 1 and 48-50.

Furthermore, Applicant submits that there is no motivation or rationale disclosed or suggested in the art to modify WO '279 in the manner asserted by the Examiner. Nor does the Examiner's opinion provide a proper basis for these features or for the motivation to modify this document in the manner suggested by the Examiner. Therefore, Applicant submits that the invention as recited in at least independent claims 1 and 48-50 is not

P20906.A07

rendered obvious by any reasonable inspection and interpretation of WO '279 with or without GORDON.

Finally, Applicant submits that dependent claims 15-19, 22-24, 27, 28, 38 and 40 are allowable at least for the reason that these claims each depend from an allowable base claim and because these claims recite additional features that further define the present invention. In particular, Applicant submits that no proper reading of WO '279 or combination with GORDON, discloses or suggests, in combination: that the device further comprises at least one cleaning device acting on a surface of the rotating roll as recited in claim 15; that said at least one cleaning device is positioned between said at least two doctors as recited in claim 16; that said at least one cleaning device comprises at least one jet cleaning or spray device arranged to direct a pressurized medium at said surface as recited in claim 17; that said pressurized medium comprises a fluid or air as recited in claim 18; that said fluid comprises water as recited in claim 19; that said at least one cleaning device emits a medium onto said surface under a pressure that is greater than approximately 20 bar as recited in claim 22; that said medium is under pressure less than about 30 bar as recited in claim 23; that said medium is under pressure less than about 25 bar as recited in claim 24; that the device further comprises a housing which is open to the rotating roll, wherein said at least one cleaning device is enclosed and/or surrounded by said housing as recited in claim 27; that said housing is sealed off from said surface by said at least two doctors as recited in claim 28; that at least

P20906.A07

one of the front and rear doctors comprises a foil doctor arranged diagonally as recited in claim 38; and that the fibrous material web comprises a paper or a cardboard web as recited in claim 40.

Accordingly, Applicant respectfully requests reconsideration and withdrawal of this rejection and further request that the above-noted claims be indicated as allowable.

***Traversal of Rejections Under 35 U.S.C. § 103(a)***

Applicant traverses the rejection of claims 1-35, 38, 40-44 and 48-50 under 35 U.S.C. § 103(a) as being unpatentable over WO '279 as necessary with US patent 5,879,514 to MESCHENMOSER and further in view of US patent 3,198,694 to JUSTUS and/or US patent 3,198,697 to JUSTUS.

Applicant also traverses the rejection of claims 1-35, 38 and 40-44 and 48-50 under 35 U.S.C. § 103(a) as being unpatentable over DE '800 and DE '958 in view of U.S. Patent 4,975,152 to FILZEN et al. as necessary with WO '279.

Applicant also traverses the rejection of claims 9-14 under 35 U.S.C. § 103(a) as being unpatentable over DE '800 and DE '958 in view of U.S. Patent 4,975,152 to FILZEN et al. as necessary with WO '279 and further in view of U.S. Patent 3,268,390 to ELY, SR.

Applicant additionally also traverses the rejection of claims 15-28 under 35 U.S.C. § 103(a) as being unpatentable over DE '800 and DE '958 in view of U.S. Patent 4,975,152

P20906.A07

to FILZEN et al. as necessary with WO '279 and further in view of U.S. Patent 5,964,960 to BOECK.

The Examiner asserts that WO '279 teaches all the recited features except for, among other things, the recited pressure ranges, a boundary layer doctor, and a traversing or rotating spray device. However, the Examiner asserted that these features are either prima facie obvious or are taught by MESCHENMOSER and the JUSTUS documents.

The Examiner also asserts that the combination of DE '800 and DE '958 teaches all the recited features except for, among other things, a grooved roll and the suction effect of the two doctors. However, the Examiner asserted that these features are either prima facie obvious or are taught by FILZEN and WO '279.

The Examiner additionally also asserts that the combination of DE '800 and DE '958 teaches all the recited features except for, among other things, a suction roll following a press nip and a roll having grooves and/or blind bores. However, the Examiner asserted that ELY, Sr. suggests the obviousness of a suction roll following a press nip and that BOECK suggests two doctors on a grooved or blind bored roll.

Accordingly, the Examiner concluded that it would have been obvious to one skilled in the art to modify and/or combine the above noted documents in order to render the above-noted claims unpatentable. Applicant respectfully traverses each of these rejections.

Notwithstanding the Office Action assertions as to what each of these documents

discloses or suggests, Applicant submits that no combination of these documents discloses or suggests, inter alia, *an additional doctor being assigned to at least one felt that is guided around the rotating roll*, the additional doctor being arranged upstream and at a distance from a take-on point and a low pressure suction device located near the additional doctor, as recited in amended claim 1, inter alia, a cleaning device arranged within the housing, wherein the cleaning device can *impinge the roll surface with a medium under a pressure that is greater than approximately 20 bar and less than about 30 bar*, as recited in amended independent claim 48, inter alia, a cleaning device arranged within the housing, wherein the cleaning device comprises *a rotating spray head that can impinge the roll surface with a medium under a pressure that is greater than approximately 20 bar and less than about 30 bar*, as recited in amended independent claim 49, and inter alia, a cleaning device comprising *a spray head with nozzles that can impinge the roll surface with a medium under a pressure that is greater than approximately 20 bar and less than about 30 bar*, as recited in amended independent claim 50.

As discussed above, Applicant does not dispute that Figs. 1 and 2 of WO '279 apparently shows a roll 5, two doctors 3 and 4, and a cleaning device 9. However, this document contains no apparent disclosure with regard to the roll 5 having grooves and/or blind bores. Nor is there any disclosure with regard to an additional doctor being assigned to at least one felt that is guided around the rotating roll, the additional doctor being arranged

P20906.A07

upstream and at a distance from a take-on point and a low pressure suction device located near the additional doctor. It is also apparent that this document lacks any disclosure with regard to a cleaning device arranged within the housing, wherein the cleaning device can impinge the roll surface with a medium under a pressure that is greater than approximately 20 bar and less than about 30 bar, or with regard to a cleaning device arranged within the housing, wherein the cleaning device comprises a rotating spray head that can impinge the roll surface with a medium under a pressure that is greater than approximately 20 bar and less than about 30 bar, or with regard to a cleaning device comprising a spray head with nozzles that can impinge the roll surface with a medium under a pressure that is greater than approximately 20 bar and less than about 30 bar.

Nor does Applicant dispute that Fig. 5 of MESCHENMOSER shows a roll 36, two doctors 60 and 92 and an additional doctor 58. However, it is clear that this document contains no disclosure with regard to an additional doctor being assigned to at least one felt that is guided around the rotating roll, the additional doctor being arranged upstream and at a distance from a take-on point and a low pressure suction device located near the additional doctor. It is also clear that this document lacks any disclosure with regard to a cleaning device arranged within the housing, wherein the cleaning device can impinge the roll surface with a medium under a pressure that is greater than approximately 20 bar and less than about 30 bar, or with regard to a cleaning device arranged within the housing, wherein the cleaning

P20906.A07

device comprises a rotating spray head that can impinge the roll surface with a medium under a pressure that is greater than approximately 20 bar and less than about 30 bar, or with regard to a cleaning device comprising a spray head with nozzles that can impinge the roll surface with a medium under a pressure that is greater than approximately 20 bar and less than about 30 bar. This document also fails to disclose whether the roll 36 has grooves and/or blind bores. Nor is there any disclosure regarding the front doctor 60 *scraping water off of the rotating roll 36* and regarding the rear doctor 92 *scraping air off of the rotating roll 36*. Finally, this document fails to disclose that *an underpressure is hydrodynamically produced by at least one of the front doctor and the rear doctor*.

Next, Applicant notes that the JUSTUS documents apparently disclose grooved rolls with a doctor, i.e., ref. 13e of JUSTUS '694 and refs. 29, 136, 136a and 137 of JUSTUS '697, assigned thereto. However, these documents contain no apparent disclosure with regard to a front doctor that *scrapes water off of the rotating roll* and regarding a rear doctor that *scrapes air off of the rotating roll*. It is also clear that these documents fail to disclose or suggest that *an underpressure is hydrodynamically produced by at least one of the front doctor and the rear doctor*. It is also clear that this document contains no disclosure with regard to an additional doctor being assigned to at least one felt that is guided around the rotating roll, the additional doctor being arranged upstream and at a distance from a take-on point and *a low pressure suction device located near the additional doctor*. Finally, it is

P20906.A07

clear that this document lacks any disclosure with regard to a cleaning device arranged within the housing, wherein the cleaning device can impinge the roll surface with a medium under a pressure that is greater than approximately 20 bar and less than about 30 bar, or with regard to a cleaning device arranged within the housing, wherein the cleaning device comprises a rotating spray head that can impinge the roll surface with a medium under a pressure that is greater than approximately 20 bar and less than about 30 bar, or with regard to a cleaning device comprising a spray head with nozzles that can impinge the roll surface with a medium under a pressure that is greater than approximately 20 bar and less than about 30 bar.

Applicant additionally does not dispute that Fig. 1 of DE '800 apparently shows a roll 14, two doctors arranged on a housing 26 and a cleaning device 30. However, this document contains no apparent disclosure with regard to the roll 12 having grooves and/or blind bores. Nor is there any disclosure with regard to an additional doctor being assigned to at least one felt that is guided around the rotating roll, the additional doctor being arranged upstream and at a distance from a take-on point and a low pressure suction device located near the additional doctor. It is also apparent that this document lacks any disclosure with regard to a cleaning device arranged within the housing, wherein the cleaning device can impinge the roll surface with a medium under a pressure that is greater than approximately 20 bar and less than about 30 bar, or with regard to a cleaning device arranged within the housing, wherein the cleaning device comprises a rotating spray head that can impinge the roll surface with a

P20906.A07

medium under a pressure that is greater than approximately 20 bar and less than about 30 bar, or with regard to a cleaning device comprising a spray head with nozzles that can impinge the roll surface with a medium under a pressure that is greater than approximately 20 bar and less than about 30 bar.

Applicant also does not dispute that Fig. 6 of DE '958 apparently shows a roll 10, two doctors 82 arranged on a housing 16. However, this document contains no apparent disclosure with regard to an additional doctor being assigned to at least one felt that is guided around the rotating roll, the additional doctor being arranged upstream and at a distance from a take-on point and a low pressure suction device located near the additional doctor. It is also apparent that this document lacks any disclosure with regard to a cleaning device arranged within the housing, wherein the cleaning device can impinge the roll surface with a medium under a pressure that is greater than approximately 20 bar and less than about 30 bar, or with regard to a cleaning device arranged within the housing, wherein the cleaning device comprises a rotating spray head that can impinge the roll surface with a medium under a pressure that is greater than approximately 20 bar and less than about 30 bar, or with regard to a cleaning device comprising a spray head with nozzles that can impinge the roll surface with a medium under a pressure that is greater than approximately 20 bar and less than about 30 bar.

Nor does Applicant dispute that Fig. 2 of FILZEN shows a flexible roll shell.

P20906.A07

However, it is clear that this document contains no disclosure with regard to an additional doctor being assigned to at least one felt that is guided around the rotating roll, the additional doctor being arranged upstream and at a distance from a take-on point and a low pressure suction device located near the additional doctor. It is also clear that this document lacks any disclosure with regard to a cleaning device arranged within the housing, wherein the cleaning device can impinge the roll surface with a medium under a pressure that is greater than approximately 20 bar and less than about 30 bar, or with regard to a cleaning device arranged within the housing, wherein the cleaning device comprises a rotating spray head that can impinge the roll surface with a medium under a pressure that is greater than approximately 20 bar and less than about 30 bar, or with regard to a cleaning device comprising a spray head with nozzles that can impinge the roll surface with a medium under a pressure that is greater than approximately 20 bar and less than about 30 bar.

Applicant additionally does not dispute that ELY SR apparently discloses a suction roll 57 that follows a press nip and a doctor associated with a roll 41 (see Fig. 2). However, this document contains no apparent disclosure with regard to a roll having grooves and/or blind bores. Nor is there any disclosure regarding a front doctor *scraping water off of the rotating roll* and regarding a rear doctor *scraping air off of the rotating roll*. This document also fails to disclose or suggest that *an underpressure is hydrodynamically produced by at least one of the front doctor and the rear doctor*. Next, it is clear that this document contains

P20906.A07

no disclosure with regard to an additional doctor being assigned to at least one felt that is guided around the rotating roll, the additional doctor being arranged upstream and at a distance from a take-on point and a low pressure suction device located near the additional doctor. Finally, it is clear that this document lacks any disclosure with regard to a cleaning device arranged within the housing, wherein the cleaning device can impinge the roll surface with a medium under a pressure that is greater than approximately 20 bar and less than about 30 bar, or with regard to a cleaning device arranged within the housing, wherein the cleaning device comprises a rotating spray head that can impinge the roll surface with a medium under a pressure that is greater than approximately 20 bar and less than about 30 bar, or with regard to a cleaning device comprising a spray head with nozzles that can impinge the roll surface with a medium under a pressure that is greater than approximately 20 bar and less than about 30 bar.

Finally, Applicant acknowledges that Fig 5 of BOECK apparently shows a roll 24 with two doctors, i.e., ref. 82 and 84, assigned thereto. However, this document contains no apparent disclosure with regard to the roll 24 having grooves and/or blind bores. To the contrary, col. 6, lines 52-53 explains that roll 24 is a “smooth central roll.” Nor is there any disclosure regarding the front doctor 82 *scraping water off of the rotating roll 24* and regarding the rear doctor 84 *scraping air off of the rotating roll 24*. It is also apparent that this document fails to disclose that *an underpressure is hydrodynamically produced by at*

P20906.A07

*least one of the front doctor and the rear doctor.* Next, it is clear that this document contains no disclosure with regard to an additional doctor being assigned to at least one felt that is guided around the rotating roll, the additional doctor being arranged upstream and at a distance from a take-on point and a low pressure suction device located near the additional doctor. Finally, it is clear that this document lacks any disclosure with regard to a cleaning device arranged within the housing, wherein the cleaning device can impinge the roll surface with a medium under a pressure that is greater than approximately 20 bar and less than about 30 bar, or with regard to a cleaning device arranged within the housing, wherein the cleaning device comprises a rotating spray head that can impinge the roll surface with a medium under a pressure that is greater than approximately 20 bar and less than about 30 bar, or with regard to a cleaning device comprising a spray head with nozzles that can impinge the roll surface with a medium under a pressure that is greater than approximately 20 bar and less than about 30 bar.

Because each of the applied documents fails to disclose or suggest at least the above-noted features of the instant invention, Applicant submits that any proper combination of these documents fails to render unpatentable the combination of features recited in at least independent claims 1 and 48-50.

Further, even assuming, *arguendo*, that it would have been obvious to modify the above-noted documents to include the features acknowledged to be missing, (which

P20906.A07

Applicant submits it would not be), Applicant notes that the combination of the teachings of these documents would nevertheless fail to result in a device that includes the combination of features recited in at least claims 1 and 48-50.

Furthermore, Applicant submits that there is no motivation or rationale disclosed or suggested in the art to modify the applied references in the manner asserted by the Examiner. Nor does the Examiner's opinion provide a proper basis for these features or for the motivation to modify any of these documents, or their combination, in the manner suggested by the Examiner. Therefore, Applicant submits that the invention as recited in at least independent claims 1 and 48-50 is not rendered obvious by any reasonable inspection and interpretation of the disclosure of the applied references.

Finally, Applicant submits that claims 2-35, 38 and 40-44 are allowable at least for the reason that these claims each depend from an allowable base claim and because these claims recite additional features that further define the present invention. In particular, Applicant submits that no proper combination of the applied documents discloses or suggests, in combination: that said at least two doctors are located before a take-on point at which at least one felt is guided onto the rotating roll as recited in claim 2; that the device further comprises a boundary layer doctor positioned adjacent said at least one felt before the take-on point as recited in claim 3; that the device further comprises a low-pressure suction device arranged for suctioning a wedge-shaped opening formed at least by the rotating roll

P20906.A07

and said at least one felt as recited in claim 4; that a distance between said boundary layer doctor and the take-on point is less than approximately 500 mm as recited in claim 5; that said distance is less than about 400 mm as recited in claim 6; that said distance is less than approximately 300 mm as recited in claim 7; that the device further comprises a press arranged before the rotating roll and a low pressure suction device arranged for suctioning a space between said press and the rotating roll as recited in claim 8; that the rotating roll comprises a suction felt guidance roll as recited in claim 9; that the device further comprises a first press of a pressing section of a paper machine, wherein said suction felt guidance roll is provided subsequently to said first press as recited in claim 10; that said first press comprises a roll press as recited in claim 11; that said first press comprises an extended nip press as recited in claim 12; that the device further comprises a spray guard positioned between said suction felt guidance roll and said first press as recited in claim 13; that said spray guard is arranged to extend substantially across a width of the machine as recited in claim 14; that the device further comprises at least one cleaning device acting on a surface of the rotating roll as recited in claim 15; that said at least one cleaning device is positioned between said at least two doctors as recited in claim 16; that said at least one cleaning device comprises at least one jet cleaning or spray device arranged to direct a pressurized medium at said surface as recited in claim 17; that said pressurized medium comprises a fluid or air as recited in claim 18; that said fluid comprises water as recited in claim 19; that said at least

P20906.A07

one cleaning device comprises a combined blowing or spraying device and suction device as recited in claim 20; that said at least one cleaning device comprises at least one rotatable spray head arranged to traverse crosswise to the travel direction and arranged to rotate around an axis as recited in claim 21; that said at least one cleaning device emits a medium onto said surface under a pressure that is greater than approximately 20 bar as recited in claim 22; that said medium is under pressure less than about 30 bar as recited in claim 23; that said medium is under pressure less than about 25 bar as recited in claim 24; that said at least one cleaning device comprises a spray head which is rotatable around an axis, said spray head including at least one nozzle which is inclined relative to said axis as recited in claim 25; that the device further comprises a vapor suctioning device, wherein said spray head is assigned to said vapor suctioning device as recited in claim 26; that the device further comprises a housing which is open to the rotating roll, wherein said at least one cleaning device is enclosed and/or surrounded by said housing as recited in claim 27; that said housing is sealed off from said surface by said at least two doctors as recited in claim 28; that the rotating roll is arranged to form a pressing nip, and said device further comprises a unit for evening out an amount of water supplied to said pressing nip as recited in claim 29; that said evening out unit comprises one of said at least two doctors as recited in claim 30; that the one doctor is the front doctor, the front doctor being arranged in front of the rear doctor relative to the travel direction as recited in claim 31; that said evening out unit comprises a blowing device

P20906.A07

for blowing out the grooves and/or the blind bores in said surface with a pressurized medium as recited in claim 32; that said pressurized medium is pressurized air as recited in claim 33; that said evening out unit includes a suction device for suctioning water out of said surface as recited in claim 34; that said evening out unit includes a combined blowing and suction device as recited in claim 35; that at least one of the front and rear doctors comprises a foil doctor arranged diagonally as recited in claim 38; that the fibrous material web comprises a paper or a cardboard web as recited in claim 40; that the device further comprises a blowing device for blowing out the grooves and/or the blind bores with a pressurized medium as recited in claim 41; that said pressurized medium comprises pressurized air as recited in claim 42; that the device further comprises a suction device for suctioning water out of the grooves and/or the blind bores as recited in claim 43; and that the device further comprises a combined blowing and suction device as recited in claim 44.

Accordingly, Applicant requests that the Examiner reconsider and withdraw the rejections of these claims under 35 U.S.C. § 103(a) and indicate that these claims are allowable.

#### CONCLUSION

In view of the foregoing, it is submitted that none of the references of record, either taken alone or in any proper combination thereof, anticipate or render obvious Applicant's

P20906.A07

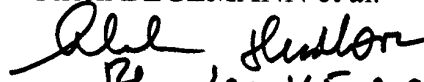
invention, as recited in each of claims 1-35, 38, 40-44 and 48-50. The applied references of record have been discussed and distinguished, while significant claimed features of the present invention have been pointed out.

Further, any amendments to the claims which have been made in this response and which have not been specifically noted to overcome a rejection based upon the prior art, should be considered to have been made for a purpose unrelated to patentability, and no estoppel should be deemed to attach thereto.

Accordingly, reconsideration of the outstanding Office Action and allowance of the present application and all the claims therein are respectfully requested and now believed to be appropriate.

The U.S. Patent and Trademark Office is hereby authorized to charge any necessary fees in connection therewith or any fees necessary for entry of the instant Amendment to deposit account No. 19-0089.

Respectfully submitted,  
Ulrich BEGEMANN et al.

  
Reg. No. 45,294

Neil F. Greenblum  
Reg. No. 28,394

May 27, 2003  
GREENBLUM & BERNSTEIN, P.L.C.  
1950 Roland Clarke Place  
Reston, VA 20191  
(703) 716-1191